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January 12, 2023

**VIA CM-ECF**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
844 North King Street  
Wilmington, Delaware 19801

Re: *Gold Reserve Inc. v. Bolivarian Republic of Venezuela*, Misc. No. 22-0453-LPS:  
Intervenor Petróleos de Venezuela, S.A.'s Request for Extension to File a Joint  
Status Report

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Dear Judge Stark:

On January 11, 2023, the Court entered an order (the "Order") in the above-referenced action that, in part, directed the parties to submit a proposed order effectuating the intervention of Petróleos de Venezuela, S.A. ("PDVSA") and setting a briefing schedule on Plaintiff's attachment motion as well as "a joint status report with the parties' positions on whether there has been any material change to any fact relevant to the factual determination(s) the Court must make with respect to the pending alter ego issues since April 2021" by January 13, 2023. D.I. 14. We write on behalf of PDVSA to respectfully request a 7-day extension of the deadline to submit a proposed order and joint status report based on recent developments concerning the political situation in Venezuela.

As has been widely reported in the media, on December 30, 2022, the Venezuelan National Assembly approved a revised "Statute to Govern a Transition to Democracy to Reestablish the Full Force and Effect of the Constitution of the Bolivarian Republic of Venezuela" (the "Transition Statute"). The Transition Statute, in part, removes Juan Guaidó as Interim President of Venezuela.<sup>1</sup> We understand that there are other matters that will be addressed by the amendments to the Transition Statute, but the process of implementing the Transition Statute by the Venezuelan National Assembly remains ongoing and, as of the date of this letter, has not been finalized. PDVSA does not currently have all of the facts concerning these ongoing developments, and, without a full understanding of such facts, PDVSA does not believe it is currently in a position to submit a proposed order and joint status report that adequately address the concerns raised in the Court's Order. PDVSA hopes to have sufficient clarity on these recent developments within 7-days, but it is possible that it may take more than 7-days to obtain sufficient clarity regarding these ongoing developments. In view of the foregoing, PDVSA respectfully requests a brief 7-day extension of the deadline to file a proposed order and joint status report to allow PDVSA to get a

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<sup>1</sup> On January 3, 2023, the U.S. State Department issued a press release stating that the United States continues to recognize the National Assembly. See Press Release, U.S. Dept. of State, Venezuela's Interim Government and the 2015 National Assembly (Jan. 3, 2023), available at, <https://www.state.gov/venezuelas-interim-government-and-the-2015-national-assembly/>.



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better understanding of the recent developments discussed above.

Counsel for the parties have conferred, and counsel for plaintiff stated that plaintiff does not oppose PDVSA requested 7-day extension.

Respectfully submitted,

*/s/ Samuel T. Hirzel*

Samuel T. Hirzel, II (#4415)

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cc: All Counsel of Record (via CM-ECF)